



## CANTON DROP FORGE



ISO 9001 and AS 9100  
Certified Quality System

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BY FEDERAL EXPRESS AND E-MAIL

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Re: Status Report - Notice of Violation (NOV)  
Canton Drop Forge  
4575 Southway Street SW, Canton, Ohio  
EPA ID #OHD004465142

Dear Messrs. Weiler, Beedle, and Kennedy:

Canton Drop Forge (CDF) is providing this status report as part of the ongoing settlement discussions to keep USEPA and Ohio EPA current on the continued progress we are making towards environmental improvements at our facility. CDF continues to be proactive in taking measures to prevent future oil releases to the ponds as well as to clean-up earlier releases. This report conveys the following information:

1. Update on status of oil-water separator improvements and process water discharge;  
and

## **2. Discussions with Ohio EPA regarding closures of Pond 1 and Pond 2.**

We continue to conduct daily inspections verifying that no on-going oil releases to the ponds are occurring. CDF has performed inspections of the existing oil-water separator and has pumped the accumulated oil to help prevent discharges to the ponds. CDF also continues to assess its combined sewer discharge requirements including softener backwash, boiler blow-down, non-contact cooling water, and process wastewater discharges, and is working with Stark County Metropolitan Sewer District and City of Massillon to meet any sanitary sewer connection requirements for these flow streams.

### **1. Oil-Water Separator Improvements and Process Water Discharge**

CDF continues to make progress finalizing plans for process piping and treatment modifications to prevent the release of process water and oil to the on-site storm water retention ponds as detailed in the previous status reports.

As noted in the September 13 and November 11, 2013 status reports, water processed through the new Oil-Water Separator (OWS) will be pumped to CDF's existing water reclaim system for reuse as cooling water or as boiler feed water. Excess recycled water, along with boiler blowdown and water softener reject, will be discharged to the Stark County Sanitary Sewer with ultimate discharge to the City of Massillon's Waste Water Treatment Plant (WWTP). We submitted a Permit-to-Install (PTI) application to Ohio EPA Northeast District Office, to City of Massillon WWTP, and to Stark County Metropolitan Sewer District on September 16, 2013. CDF has been in regular telephone and e-mail communication with Ohio EPA-Northeast District Office, City of Massillon, and Stark County since the PTI application submittal to provide additional information and to answer questions regarding the proposed PTI. Additionally, we prepared a written response to Ohio EPA's comments on October 29 and November 11, to resolve each of the Ohio EPA comments. However, due to extended flow studies conducted by Stark County and on-going boiler blow-down and water softener backwash flow assessments by CDF, final sanitary sewer connection details are still being finalized. We expect that final plans will be defined by approximately mid-February, at which time, we will submit a revised PTI application to Ohio EPA along with written approvals for discharge from both Stark County and the City of Massillon.

The OWS has been fabricated and will be delivered to our site and installed as soon as the PTI is approved. We have received construction bids for the project from contractors. Installation of the OWS will start following PTI approval.

### **2. Discussion with Ohio EPA**

A conference call with Ohio EPA, Canton Drop Forge (CDF) and TRC was held January 29, 2014 to discuss closure plans for Pond 1 and Pond 2. Ohio EPA was represented by Ed Lim, DERR Engineering Section Manager and Eric Hagen (Environmental Specialist, DERR, Central Office).

CDF is proceeding with preparing a draft Closure Plan for the ponds to achieve “clean” closure through removal of all used oil and bottom materials within the unit boundaries that are established in the Closure Plan. This will include removal of the clay liner and treated bio-cell material that was placed beneath Pond 1 in 1997 to 1998. CDF intends to submit a draft Closure Plan to Ohio EPA for its review and comment by mid-February. Once any comments on the draft Plan are addressed, the final Plan will be submitted for Ohio EPA review and for the required 45 day public notice period. However, it is understood that CDF would not be able to submit a final Closure Plan until the Consent Agreement and Final Order (CAFO) was signed between USEPA and CDF.

The following items were discussed:

- **Unit Boundaries** – The boundaries of the pond units are depicted in site drawings to be submitted as part of the plan. Designated space around each unit defines space for staging of equipment, and identifies entrance and exit locations. The figure of the proposed areas was provided for discussion and is enclosed.
- **Site Characterization Results in Closure Plan** – A substantial amount of data has been collected at the site. The Closure Plan will present the prior data to characterize the Ponds and surrounding area and identify potentially impacted media. The Closure Plan will present applicable Closure Performance Standards and confirmation sampling design to determine that the standards have been achieved.
- **Pond and Bottom Material Dewatering during Construction, Staging, and Materials Handling Approach** – A general overview of the removal process was discussed. Removal will not begin until the upgraded OWS is in place and process water improvements are on-line and weather conditions permit. Pond water will be removed to the extent possible utilizing a 5’ diameter wet well. The current plan includes treating the pond water through the new OWS and to recycle and reuse the water as process water. Water unable to be treated will be discharged to the public sewer treatment system pending the approvals discussed above. As bottom materials and impacted media are excavated, the piles will be stacked on the slope of the pond sidewalls allowing free liquids to drain back into the pond for subsequent collection and removal. As necessary, a drying agent (e.g., Calciment) may be used for solidification of the bottom material prior to off-site disposal. Detailed information, including any staging, transportation, disposal, equipment, decontamination procedures, and contingencies, will be clearly specified in the Closure Plan.

Subject to regulatory approvals, and mentioned earlier, the closure of Pond 1 and Pond 2 is anticipated to begin in the summer of 2014, as soon as the OWS and process water improvements are on-line and weather conditions permit. The site ponds will continue, both during remediation and following their completion, to be used for storm water retention. No process water will be discharged to ponds in the future, and measures will

be taken to prevent impacted storm water from reaching them (e.g., storm water oil-water separators and other storm water pollution best management practices).

### **Closing**

We look forward to continuing our discussion to resolve the NOV issues. We are available for a conference call at your convenience if you would like to discuss these issues further.

#### **Canton Drop Forge, Inc.**



Brad Ahbe  
President

#### **TRC Environmental Corporation**



Donald A. Fay, Ohio VAP C.P. # 254  
Vice President

### **Attachments**

cc: Ed Lim – Ohio EPA Central Office  
Erik Hagen – Ohio EPA Central Office  
Kevin Palombo – Ohio EPA Northeast District Office  
Mark Navarre – Ohio EPA Central Office  
Todd Anderson – Ohio EPA Central Office  
Sue Kroeger – Ohio EPA Central Office  
Kim K. Burke – Taft, Stettinius & Hollister LLP